



1:25 pm, 7/22/21

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

No.

21CR11-NDF

Margaret Botkins
Clerk of Court

Plaintiff,

v.

SALVADOR SALAS, JR.,

Defendant.

Ct 1: 18 U.S.C. § 2252A(a)(5)(B),
(b)(2)
(Possession of Child
Pornography)

Ct 2-6: 18 U.S.C. § 2251(a), (e)
(Production of Child
Pornography)

REDACTED – *Minor Victim*

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about March 2, 2021, in the District of Wyoming, the Defendant, **SALVADOR SALAS, JR.**, did knowingly possess material which contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involve prepubescent minors, and which were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, namely, the Defendant possessed a Sony laptop computer, model PCG-7142L, serial number C6U0B6V6, containing a single 160 GB SATA Hitachi hard disk drive, product number 0A57353, serial number 080807FB2200LCCGH69A, a product of Thailand, a 4TB Seagate Expansion Desktop Drive, product number 1TFAP3, serial number NAAB2F5N, a product of Thailand, and an Apple iPhone 7 Plus, model number A1661, serial number F2LSQFSJHFXW, a product of China, that contains digital images depicting prepubescent minors engaged in sexually explicit conduct.

In violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

COUNT TWO

On or about February 27, 2021, in the District of Wyoming, the Defendant, **SALVADOR SALAS, JR.**, knowingly used, persuaded, induced, enticed, and coerced a minor, _____, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely video IMG_4576.MP4, said visual depiction having been produced using material, including an Apple iPhone 7 Plus, a product of China, that had been mailed, shipped or transported in an affecting interstate or foreign commerce.

In violation of 18 U.S.C. § 2251(a), (e).

COUNT THREE

On or about February 27, 2021, in the District of Wyoming, the Defendant, **SALVADOR SALAS, JR.**, knowingly used, persuaded, induced, enticed, and coerced a minor, _____, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, namely videos IMG_4577.MP4 and IMG_4578.MP4, said visual depictions having been produced using material, including an Apple iPhone 7 Plus, a product of China, that had been mailed, shipped or transported in an affecting interstate or foreign commerce.

In violation of 18 U.S.C. § 2251(a), (e).

COUNT FOUR

On or about February 27, 2021, in the District of Wyoming, the Defendant, **SALVADOR SALAS, JR.**, knowingly used, persuaded, induced, enticed, and coerced a minor, _____, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely video IMG_4580.MP4, said visual depiction having been produced using material, including an Apple iPhone 7 Plus, a product of China, that had been mailed, shipped or transported in an affecting interstate or foreign commerce.

In violation of 18 U.S.C. § 2251(a), (e).

COUNT FIVE

On or about February 27, 2021, in the District of Wyoming, the Defendant, **SALVADOR SALAS, JR.**, knowingly used, persuaded, induced, enticed, and coerced a minor, _____, to engaged in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely video IMG_4592.MOV, said visual depiction having been produced using material, including an Apple iPhone 7 Plus, a product of China, that had been mailed, shipped or transported in an affecting interstate or foreign commerce.

In violation of 18 U.S.C. § 2251(a), (e).

COUNT SIX

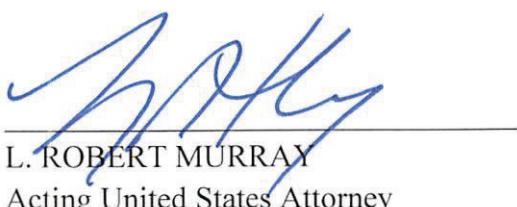
On or about February 27, 2021, in the District of Wyoming, the Defendant, **SALVADOR SALAS, JR.**, knowingly used, persuaded, induced, enticed, and coerced a minor, _____, to engaged in sexually explicit conduct for the purpose of producing visual depictions of such conduct, namely photographs, said visual depictions having been produced using material, including an Apple iPhone 7 Plus, a product of China, that had been mailed, shipped or transported in an affecting interstate or foreign commerce.

In violation of 18 U.S.C. § 2251(a), (e).

A TRUE BILL:

Ink Signature on File

FOREPERSON



L. ROBERT MURRAY
Acting United States Attorney

PENALTY SUMMARY

DEFENDANT NAME: **SALVADOR SALAS, JR.**

DATE: July 20, 2021

INTERPRETER NEEDED: No

VICTIM(S): Yes

OFFENSE/PENALTIES:

Ct: 1 18 U.S.C. § 2252A(a)(5)(B), (b)(2)
(Possession of Child Pornography)

0-20 Years Imprisonment
Up To \$250,000 Fine
5 Years To Life Supervised Release
\$100 Special Assessment
\$5,000 Special Assessment Pursuant To The Victims Of Sex
Trafficking Act Of 2015
Up To \$17,000 Special Assessment And Mandatory
Restitution Of Not Less Than \$3,000 Per Requesting Victim
Pursuant To The Amy, Vicky And Andy Child Pornography
Victim Assistance Act Of 2018

Ct: 2-6 18 U.S.C. § 2251(a), (e)
(Production of Child Pornography)

15-30 Years Imprisonment
Up To \$250,000 Fine
5 Years To Life Supervised Release
\$100 Special Assessment
\$5,000 Special Assessment Pursuant To The Victims Of Sex
Trafficking Act Of 2015
Up To \$50,000 Special Assessment And Mandatory
Restitution Of Not Less Than \$3,000 Per Requesting Victim
Pursuant To The Amy, Vicky And Andy Child Pornography
Victim Assistance Act Of 2018

TOTALS: Life Imprisonment
Up To \$1,500,000 Fine
Life Supervised Release
\$600 Special Assessment
\$30,000 Special Assessment Pursuant To The Victims Of
Sex Trafficking Act Of 2015
Up To \$267,000 Special Assessment And Mandatory
Restitution Of Not Less Than \$3,000 Per Requesting Victim
Pursuant To The Amy, Vicky And Andy Child Pornography
Victim Assistance Act Of 2018

AGENT: Shannon Daley, FBI

AUSA: Christyne M. Martens, Assistant United States Attorney

**ESTIMATED TIME OF
TRIAL:** 1 to 5 days

**WILL THE GOVERNMENT
SEEK DETENTION IN THIS
CASE:** Yes

**ARE THERE DETAINERS
FROM OTHER
JURISDICTIONS:** No